

CALIFORNIA COASTAL COMMISSION

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September 27, 2021

County of Sonoma
Planning Department
Attn: Cecily Condon, Gary Helfrich
2550 Ventura Ave.
Santa Rosa, CA 95403

Subject: County of Sonoma Draft Local Coastal Program Land Use Plan Update: Public Safety Chapter

Dear Ms. Condon and Mr. Helfrich:

Thank you for the opportunity to review and comment on the County's proposed update to the Local Coastal Program (LCP) Land Use Plan (LUP). We want to thank the staff involved in this update for their hard work, and for coordinating with us during this process. In our experience, this type of early coordination helps to ensure a smoother LCP certification process, including streamlining review and resolution of issues upon submittal to the Coastal Commission. The comments and recommendations below summarize the overarching feedback on Chapter 9: Public Facilities and Services.

The list below is intended as a complement to the in-line edits and comments provided for the Public Facilities and Services Element, but is not exhaustive of every comment and edit included. Therefore, edits and comments in the chapter itself should be treated as the primary source of feedback, with this letter serving as guidance containing some of the major themes of our recommendations. We anticipate discussing these issues in more detail during staff-to-staff coordination meetings with Sonoma County staff:

1. In the body of this chapter, there should be a section discussing relevant Coastal Act policies and how they relate to public facilities and services in Sonoma County. To complement this discussion, relevant coastal act policies should be incorporated in relevant part, including:
 - Section 30114. "Public works"
 - Section 30118. "Special district"
 - Section 30212.5. "Public facilities; distribution"
 - Section 30222. "Private lands; priority and development purposes"
 - Section 30231. "Biological Productivity, Water quality"
 - Section 30250. "Location; existing developed area"
 - Section 30254. "Public works facilities"
 - Section 30254.5. "Terms or conditions on sewage treatment plant developments"
2. To complement Policy C-PF-2a and C-PF-2p this chapter should include a discussion on Coastal Act priority and non-priority uses The Land Use Element

Table C-LU-2 does contain information on establishing what priority and non-priority uses are, but does not contain information specifically relating to water and sewer resources and how limited water and sewer capacity might be allocated to the designated priority vs. non-priority uses.

3. Overall, this element does not contain any information or guidance on the potential effects of climate change and sea level rise on the availability of water and the build-out of sewer systems. This should be incorporated into this element, especially when considering new water and wastewater systems such as outlined in Policy C-PF-2d.
4. This element seems to be missing specific information and data on the capacity that exists for future development within Sonoma County. Other LCP updates commonly contain details on what is available for future buildout, including estimated water demands, the amount of available water under different development horizons, the estimated amount of water connections available, and equivalent information on wastewater management. Having this data allows the County to divide future capacity between priority and non-priority uses, gives the public an awareness of what might be available for non-priority uses in the future, and establishes back stops to assure all prospective development, whether priority or not, is able to be served. We highly recommend including this data in this element, or if this data does not currently exist, include gathering this data as an actionable policy in this element such as shown in the comments on Other Initiative C-PF-1.

Again, we thank you for your efforts to date on the update to the LUP, and we look forward to continued coordination toward this end.

Sincerely,

Peter Benham

Peter Benham
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North Central Coast District Office
California Coastal Commission